



Andrea Young
Associate Director, Regulatory Affairs
Sunovion Pharmaceuticals, Inc.
84 Waterford Drive
Marlborough, MA 01752-7010

RE: NDA 022416
Aptiom[®] (eslicarbazepine acetate) Tablets
MA #143

Dear Ms. Young:

The Office of Prescription Drug Promotion (OPDP) of the U.S. Food and Drug Administration (FDA) has reviewed a print advertisement (APT527-14) for Aptiom[®] (eslicarbazepine acetate) Tablets (Aptiom) submitted by Sunovion Pharmaceuticals, Inc. (Sunovion) under cover of Form FDA 2253. The print advertisement is misleading because it overstates the efficacy of Aptiom. Thus, the print advertisement misbrands Aptiom within the meaning of the Federal Food, Drug, and Cosmetic Act (FD&C Act), and makes its distribution violative. 21 U.S.C. 352(n); 331(a). See 21 CFR 202.1(e)(6)(i).

Background

Below are the indication and summary of the most serious and most common risks associated with the use of Aptiom.¹

Aptiom is indicated as adjunctive treatment of partial-onset seizures.

Aptiom is associated with a number of serious risks, some of which are potentially fatal. Aptiom is contraindicated in patients with a hypersensitivity to eslicarbazepine or oxcarbazepine. The FDA-approved product labeling (PI) includes warnings and precautions regarding suicidal behavior and ideation, serious dermatological reactions, drug reaction with eosinophilia and systemic symptoms/multiorgan hypersensitivity, anaphylactic reactions and angioedema, hyponatremia, neurological adverse reactions, withdrawal of antiepileptic drugs, drug induced liver injury, and abnormal thyroid function tests.

The most common adverse reactions in patients receiving Aptiom were dizziness, somnolence, nausea, headache, diplopia, vomiting, fatigue, vertigo, ataxia, blurred vision, and tremor.

¹ This information is for background purposes only and does not necessarily represent the risk information that should be included in the promotional pieces cited in this letter.

Overstatement of Efficacy

Promotional materials are misleading if they contain a representation or suggestion that a drug is more effective than has been demonstrated by substantial evidence or substantial clinical experience.

The print advertisement includes the following claim and presentations (emphasis original):

Page one:

- **“SEIZURES CAN KEEP PATIENTS FEELING CONFINED”**
- Image of a house completely surrounded by a fence, which appears to be made of electroencephalogram (EEG) brain waves. The house is dark, with the exception of a light from a room on the second floor showing a man looking out of the window.

Pages two and three:

- Images of the same house, the light in the now empty second floor window is out, and the man is now walking, together with a woman and a dog, away from the house towards an opening in the fence.

In the context of this branded print advertisement for Aptiom, this claim and presentations misleadingly overstate the efficacy of Aptiom by suggesting that the drug has been shown to have treatment benefits on patients' feelings of confinement associated with seizures. According to the CLINICAL STUDIES section of the PI for Aptiom, the primary endpoint in the clinical studies with Aptiom was the “standardized seizure frequency during the Maintenance Phase over 28 days.” Although Aptiom may reduce seizure frequency, FDA is not aware of substantial evidence demonstrating any effectiveness of Aptiom on patients' **feelings of confinement** associated with seizures. Claims and presentations of such treatment benefits must be supported by substantial evidence as demonstrated by adequate and well-controlled studies using well-developed instruments that can validly and reliably measure the specific concepts claimed. If you have data to support the claim and presentations, please submit them to FDA for review.

Conclusion and Requested Action

For the reasons discussed above, the print advertisement misbrands Aptiom within the meaning of the FD&C Act and makes its distribution violative. 21 U.S.C. 352 (n); 331(a). See 21 CFR 202.1(e)(6)(i).

OPDP requests that Sunovion immediately cease violating the FD&C Act, as discussed above. Please submit a written response to this letter on or before December 31, 2014, stating whether you intend to comply with this request, listing all promotional materials (with the 2253 submission date) for Aptiom that contain presentations such as those described above, and explaining your plan for discontinuing use of such materials.

Please direct your response to the undersigned at the **Food and Drug Administration, Center for Drug Evaluation and Research, Office of Prescription Drug Promotion, 5901-B Ammendale Road, Beltsville, Maryland 20705-1266** or by facsimile at (301) 847-8444.

To ensure timely delivery of your submissions, please use the full address above and include a prominent directional notation (e.g. a sticker) to indicate that the submission is intended for OPDP. Please refer to MA #143 in addition to the NDA number in all future correspondence relating to this particular matter. All correspondence should include a subject line that clearly identifies the submission as a Response to Untitled Letter. OPDP reminds you that only written communications are considered official.

The violations discussed in this letter do not necessarily constitute an exhaustive list. It is your responsibility to ensure that your distribution of Aptiom complies with each applicable requirement of the FD&C Act and FDA implementing regulations.

Sincerely,

{See appended electronic signature page}

Melinda McLawhorn, PharmD, BCPS
Regulatory Review Officer
Office of Prescription Drug Promotion

{See appended electronic signature page}

Mathilda Fienkeng, PharmD
Team Leader
Office of Prescription Drug Promotion

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/s/

MELINDA W MCLAWHORN
12/15/2014

MATHILDA K FIENKENG
12/15/2014